

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Cause No. 18 CR 2945 WJ
	§	
SIRAJ IBN WAHHAJ, et al.,	§	
	§	
Defendants.	§	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY

SIRAJ IBN WAHHAJ, Defendant, by and through his appointed counsel, Marc H. Robert, respectfully moves this Court for an extension of time to file a reply to the Government's response [Doc. 566] to Defendant's motion for suppression of evidence [Doc. 471], and in support thereof would respectfully show the Court as follows:

1. On October 20, 2022, Mr. Wahhaj filed a motion joined by all Defendants seeking suppression of evidence [Doc. 471]. The Government filed its response on December 30, 2022 [Doc. 566]. Both the motion and the response were accompanied by a number of exhibits.

2. The undersigned counsel was appointed as co-counsel for Mr. Wahhaj on November 18, 2022 following the withdrawal of Erlinda Johnson as

Mr. Wahhaj's co-counsel. The undersigned counsel will prepare a reply to the Government's response, but will need additional time to complete research and to prepare the reply. Counsel requests an extension of the due date for Defendants' reply to Monday, January 23, 2022.

3. The undersigned counsel has conferred with Assistant United States Attorney Kimberly Brawley regarding this request. The Government has no objection to the requested extension.

WHEREFORE, SIRAJ IBN WAHHAJ , Defendant, respectfully requests this Court enter an Order extending the due date for Defendants' reply to the Government's response to Defendants' joint motion for suppression of evidence [Doc. 471] to Monday, January 23, 2022, and providing for such other and further relief to which the Court may find the parties to be justly entitled.

Respectfully Submitted,

/s/ *Electronically filed on 1/6/23*

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